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UNITED STATES DISTRICT COURT FOR THE EASTERN DISTRICT OF MISSOURI EASTERN DIVISION

KAREN KURATNICK,)
	Plaintiff,) Case No. 4:19-CV-01169-JCH
VS.		}
VOGLER & ASSOCIATES, LLC,		
	Defendant.	\ \

DEFENDANT'S ANSWER TO PLAINTIFF'S COMPLAINT

COMES NOW Defendant, by and through its attorney, and for its response to Plaintiff's Complaint, states as follows:

- 1. Defendant admits the statements and allegations contained in paragraph 1 of Plaintiff's Complaint.
- 2. Defendant admits the statements and allegations contained in paragraph 2 of Plaintiff's Complaint.
- 3. Defendant denies the statements and allegations contained in paragraph 3 of Plaintiff's Complaint.
- 4. Defendant denies the statements and allegations contained in paragraph 4 of Plaintiff's Complaint.
- 5. Defendant denies the statements and allegations contained in paragraph 5 of Plaintiff's Complaint.
- 6. Defendant denies the statements and allegations contained in paragraph 6 of Plaintiff's Complaint.
- 7. Plaintiff can neither admit nor deny the statements and allegations contained in paragraph 7 of Plaintiff's Complaint, and therefore, denies same.
- 8. Plaintiff can neither admit nor deny the statements and allegations contained in paragraph 8 of Plaintiff's Complaint, and therefore, denies same.
- 9. Defendant denies the statements and allegations contained in paragraph 9 of Plaintiff's Complaint.
- 10. Defendant denies the statements and allegations contained in paragraph 10 of Plaintiff's Complaint.

- 11. Defendant denies the statements and allegations contained in paragraph 11 of Plaintiff's Complaint.
- 12. Defendant denies the statements and allegations contained in paragraph 12 of Plaintiff's Complaint.
- 13. Defendant denies the statements and allegations contained in paragraph 13 of Plaintiff's Complaint.
- 14. Defendant denies the statements and allegations contained in paragraph 14 of Plaintiff's Complaint.
- 15. Defendant denies the statements and allegations contained in paragraph 15 of Plaintiff's Complaint.
- 16. Defendant denies the statements and allegations contained in paragraph 16 of Plaintiff's Complaint.
- 17. Defendant denies the statements and allegations contained in paragraph 17 of Plaintiff's Complaint.
- 18. Defendant denies the statements and allegations contained in paragraph 18 of Plaintiff's Complaint.
- 19. Defendant denies the statements and allegations contained in paragraph 19 of Plaintiff's Complaint.
- 20. Defendant denies the statements and allegations contained in paragraph 20 of Plaintiff's Complaint.
- 21. Defendant denies the statements and allegations contained in paragraph 21 of Plaintiff's Complaint.
- 22. Defendant denies the statements and allegations contained in paragraph 22 of Plaintiff's Complaint.
- 23. Defendant denies the statements and allegations contained in paragraph 23 of Plaintiff's Complaint.
- 24. Defendant denies the statements and allegations contained in paragraph 24 of Plaintiff's Complaint.

- 25. Defendant denies the statements and allegations contained in paragraph 25 of Plaintiff's Complaint.
- 26. Defendant denies the statements and allegations contained in paragraph 26 of Plaintiff's Complaint.
- 27. Defendant denies the statements and allegations contained in paragraph 27 of Plaintiff's Complaint.
- 28. Defendant denies the statements and allegations contained in paragraph 28, 28(a), 28(b), 28(c), and 28(d) of Plaintiff's Complaint.

WHEREFORE, Plaintiff requests this Court to dismiss Plaintiff's Complaint; and for such other and further relief as the Court deems just and proper.

VOGLER & ASSOCIATES, LLC

By: MICHAEL A. KASPEREK #32036MO

Attorney for Defendant

11756 Borman Drive, Suite 200

St. Louis, MO 63146 (314) 567-7970

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È-Mail: voglaw@earthlink.net

CERTIFICATE OF SERVICE

The undersigned hereby certifies that a true and correct copy of the foregoing was served on this day of July, 2019, upon ____ the Clerk of the Eastern District of Missouri, Eastern Division, via CM/ECF; upon ____ Bryan Brody, Attorney for Plaintiff, via CM/ECF; and upon ____ Alexander Cornwell, Attorney for Plaintiff, via CM/ECF.

/s/ Michael A. Kasperek

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